

July 28, 2006

I hope all of you are enjoying the sunny days of summer! In this month's e-mail, the following topics are covered:

- New Advisory Opinion regarding General Statutes § 1-84 (p)
- Frequently-asked Questions
 - Who Must Report an Ethics Violation?

New Advisory Opinion

On July 27, 2006, the Citizen's Ethics Advisory Board met and decided on one new advisory opinion, summarized below. Click on the AO number to read the full text of the opinion.

[2006-6](#)

This opinion interprets General Statutes § 1-84 (p), a recently-enacted provision in the Code of Ethics for Public Officials. This three-part provision limits gift-giving between certain individuals in state service. Specifically, the provision imposes a monetary limit of \$99.99 between a public official or state employee and his or her supervisor. The Board concluded that this limit is a per-gift – not a per-year – amount. The Board also concluded that individuals subject to the limit in § 1-84 (p) may still make use of the major-life-event exception. In other words, supervisors and subordinates are not limited to \$99.99 when giving gifts to each other for major life events. Finally, the Board concluded that the provision applies not only to direct supervisors and subordinates, but to any individual up or down the chain of command.

Frequently-asked Questions

The Office of State Ethics is pleased to note that we have now trained, in-person, over 700 state employees. Meeting so many of your agency personnel has provided us with a valuable opportunity to learn what parts of the codes cause the most confusion, and what scenarios arise most frequently.

A semi-regular feature of this monthly newsletter will now contain answers to these common questions. Additionally, in the next few months, we will be revising the "Frequently Asked Questions" section of our Web site to reflect current situations affecting agency personnel.

In this communication, we will touch on a question we have encountered in nearly every training session: reporting requirements pertaining to code violations.

Reporting Violations – Requirements

The language regarding who is required to report ethics violations is found in General Statutes § 1-101pp. Specifically, the law requires the following individuals, should they have reasonable cause to believe that a person has violated the Code of Ethics for Public Officials (Part I), to report such belief to the Office of State Ethics:

- Commissioners;
- Deputy Commissioners;
- State Agency Heads and Deputy Heads;
- Quasi-public Agency Heads and Deputy Heads; and
- Persons in charge of state agency procurement and contracting.

Note that these individuals must also report suspected violations of any other law concerning ethics in state contracting.

Ethics liaisons are ***not*** mandated to report violations of the codes. Likewise, ethics compliance officers are ***not*** mandated to report violations of the codes.

To submit a question to be addressed in this electronic forum or on the OSE's Web site, please e-mail the question to Meredith.Trimble@ct.gov.

As always, we seek to find and utilize innovative and substantive ways to assist you in your roles as agency ethics liaison officers or ethics compliance officers. We look forward to your cooperation in making Connecticut a model for ethics in state government. Your input is always welcome as we continue in our dialogue.

Sincerely,

Meredith Trimble
Director of Education
Office of State Ethics